

Our Ref: 01.01.01.01-4490U
UKOP Doc Ref:1130113



Offshore Petroleum Regulator
for Environment & Decommissioning

PETROFAC FACILITIES MANAGEMENT LIMITED
BRIDGE VIEW
1 NORTH ESPLANADE WEST
ABERDEEN
AB11 5QF

Registered No.: SC075047

Date: 26th March 2021

Department for Business, Energy
& Industrial Strategy

AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]
Fax [REDACTED]

www.gov.uk/beis
bst@beis.gov.uk

Dear Sir / Madam

**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

Elgood Development Well 48/22c-H1 (EL_H1)

A screening direction for the project detailed in your application, reference DR/2065/0 (Version 2), dated 5th March 2021 has been issued under regulation 6 of the above Regulations. The screening direction notice, and any relevant conditions and comments are attached. A copy of this screening direction will be forwarded to the application consultees, the Oil and Gas Authority and published on the gov.uk website.

If you have any queries in relation to this screening direction or the attachments, please do not hesitate to contact [REDACTED] on [REDACTED] or email the Environmental Management Team at bst@beis.gov.uk.

Yours faithfully



**THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING
AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS
2020**

**SCREENING DIRECTION CONFIRMING THAT AN ENVIRONMENTAL IMPACT
ASSESSMENT IS NOT REQUIRED**

Elgood Development Well 48/22c-H1 (EL_H1)

DR/2065/0 (Version 2)

Whereas PETROFAC FACILITIES MANAGEMENT LIMITED has made an application dated 5th March 2021, under The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020, and whereas the Secretary of State has considered the application and is satisfied that the project is not likely to have a significant effect on the environment; in exercise of the powers available under regulation 6, the Secretary of State hereby directs that the application for consent in respect of the project need not be accompanied by an Environmental Impact Assessment, provided that the project is carried out as described in the application for the screening direction and in accordance with the conditions specified in the attached schedule.

In giving a screening direction under regulation 6 of the above Regulations, the Secretary of State accordingly gives his agreement to the Oil and Gas Authority to the grant of consent for the project as detailed in the application.

Effective Date: 26th March 2021



THE OFFSHORE OIL AND GAS EXPLORATION, PRODUCTION, UNLOADING AND STORAGE (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2020

SCHEDULE OF SCREENING DIRECTION CONDITIONS

The grant of this screening direction is conditional upon the screening direction holder complying with the following conditions.

1 Screening direction validity

The screening direction shall be valid from 30 March 2021 until 31 August 2021.

2 Commencement and completion of the project

The holder of the screening direction must notify the Department for Business, Energy & Industrial Strategy (hereinafter called the 'Department') of commencement and completion of the project within two days:

- a) of commencement of the project and
- b) of completion of the project.

Notification should be sent by email to the Environmental Management Team Mailbox: bst@beis.gov.uk

3 Prevention of pollution

The holder of the screening direction must ensure that appropriate measures are taken to minimise discharges, emissions and waste, in particular through the appropriate use of technology; and to ensure that necessary measures are taken to prevent incidents affecting the environment or, where they occur, to limit their consequences in relation to the environment.

4 Inspections

Should the Department consider it necessary or expedient for an inspector appointed by the Secretary of State to investigate whether the conditions of the screening direction are being complied with, the holder of the screening direction shall afford the inspector with such facilities and assistance as the inspector considers necessary to exercise the powers conferred by the regulations. The holder of the screening direction shall additionally ensure that copies (electronic or paper) of the screening direction and any other relevant documents are available for inspection by the inspector at:

- a) the premises of the holder of the screening direction; and
- b) the facilities undertaking the project covered by the screening direction.



5 Check monitoring

Should the Department consider it necessary or expedient to undertake an independent monitoring programme to assess the impact of the project covered by the screening direction, the screening direction holder shall afford the Department with such facilities and assistance as the Department considers necessary to undertake the work.

6 Atmospheric emissions returns

Following completion of the project covered by the screening direction, the holder of the screening direction shall report all relevant atmospheric emissions, such as combustion emissions, extended well test emissions or flaring and venting emissions relating to a well test, using the appropriate Environmental Emissions Monitoring System (EEMS) reporting forms. In the case of atmospheric emissions relating to drilling projects undertaken from a fixed installation, they should be included in the annual EEMS reporting forms for the fixed installation.

7 Unauthorised deposits

Following completion of the project covered by the screening direction, the holder of the screening direction shall recover any materials accidentally or temporarily deposited on the seabed, such as debris, temporary containers, structures or deposits, or scientific instruments, and shall return the materials to land. If it is not possible to recover any of these deposits, full details of the materials remaining on the seabed must be reported to the Department in accordance with the requirements of Petroleum Operations Notice No.2 (PON2).

8 Screening direction variation

In the event that the holder of the screening direction proposes changes to any of the particulars detailed in the application for a screening direction, the holder must notify the Department immediately and submit an application for a post screening direction amendment. The post screening direction must be in place prior to the amended proposals taking effect.



COMMENTS ON THE APPLICATION FOR SCREENING DIRECTION

Section 1

The attention of screening direction holders is drawn to the following provisions regarding The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Assessment) Regulations 2020.

1) You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the project covered by the screening direction. The issue of a screening direction does not absolve the screening direction holder from obtaining such authorisations, consents etc that may be required under any other legislation.

2) The Department would draw your attention to the following comments:

The Department has no comments.

3) All communications relating to the screening direction should be addressed to:

Out-of-hours emergency screening direction variations:

Telephone Met Office out-of-hours service (0330 135 0010) and ask to be connected to the Department's On-call Response Officer (Offshore Environmental Inspectorate).

Routine communications

bst@beis.gov.uk

or

Offshore Petroleum Regulator for Environment & Decommissioning
Department for Business, Energy & Industrial Strategy
AB1 Building
Crimon Place
Aberdeen
AB10 1BJ

Tel [REDACTED]

Fax [REDACTED]



SCHEDULE OF SCREENING DIRECTION DECISION REASONS

The Secretary of State has decided that, based on the information provided, the project is not likely to have a significant effect on the environment. The main reasons for this decision are:

1) Decision reasons

The following provides a summary of the assessments undertaken by OPRED to determine whether an Environmental Impact Assessment is required for this project, summarises the information considered, the potential impacts and sets out the main reasons for the decision made. In considering whether an Environmental Impact Assessment is required or not, the following have been taken into account:

1. The information provided by the developer.
2. The matters listed in Schedule 5 of The Offshore Oil and Gas Exploration, Production, Unloading and Storage (Environmental Impact Regulations 2020) (the Regulations).
3. The results of any preliminary verifications or assessments of the effects on the environment of the project; and
4. Any conditions that the Secretary of State may attach to the agreement to the grant of consent.

Characteristics of the Project

Having regard, in particular, to the matters identified at paragraphs 1(a) to (g) of Schedule 5 to the Regulations, the characteristics of the project include the following:

Summary of the project:

- The drilling of the Elgood Development Well was assessed in the Blythe Development Hub Environmental Statement which was approved on the 29th April 2020 (D/4208/2018).
- The Noble Hans Duel Jack Up Rig will be used to drill the EL_H1 development well.
- The well will consist of the following five sections; 36" and 17.5" sections drilled using Water Based Mud (WBM) and the 12.25", 8.5" and 6" sections drilled using Low Toxicity Oil Based Mud (LTOBM).
- The well will be cleaned-up, completed and suspended (at the xmas tree).

Description of project:



This project consists of the drilling of the horizontal gas development well 48/22 c_H1 (EL_H1) using the Mobile Offshore Drilling Unit (MODU) Noble Hans Duel Jack Up in order to target the Rotliegendes reservoir within the Leman Sandstone. Operations are expected to last a total of 89 days and are expected to commence 30 March and completed by 31 August 2021.

The well will consist of five sections. The 36" and 17" sections will be drilled using WBM with cuttings discharged at the drill site. The other sections will be drilled with LTOBM with cuttings skipped and shipped to shore for treatment and disposal. On completion of the drilling operations the well will be cleaned up and displaced to brine prior to running the gas lift completion.

No cumulative impacts are expected to occur with any other existing or approved projects.

It is not considered to be likely that the project will be affected by natural disasters.

The risk of a major accident hazard, for example, a well blow out, has been assessed. The developer has control measures in place to reduce the risk of a major accident occurring and the probability of such an event occurring is very low.

Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

Location of the Project

Having regard in particular to the matters identified at paragraphs 2(a) to (c) of Schedule 5 to the Regulations, the environmental sensitivity of geographical areas likely to be affected by the project has been considered as follows:

The project area is in Block 44/22c in the southern North Sea (SNS) approximately 43 kilometres (km) north east of the UK and 110 km west of the UK/Netherlands median line. The well is in a water depth of 25 metres (m).

EL_H1 is within 40km of the following protected areas:

Greater Wash Special Protected Area (SPA) 35.4km southwest.

Cromer Shoal Chalk Beds Marine Conservation Zone (MCZ), 31.8km south.

Inner Dowsing, Race Bank and North Ridge Special Area of Conservation (SAC), 24km northwest.

Southern North Sea SAC, 21.3km east.

Haisborough, Hammond and Winterton SAC, 35.2km southeast.

North Norfolk Sandbanks and Saturn Reef (NNSSR) SAC, located 17.1km



east.

The Wash and North Norfolk Coast SAC, 33.6km southwest.

The project is in an area characterised by deep circalittoral sand and symmetrical megaripples (up to 1m in height and 9m wavelengths). Recent surveys indicate that sediments in the area consist predominantly of gravelly sand with shell fragments. The quantitative assessment of seabed imagery obtained during the survey indicated that the species abundance and diversity were typical of the SNS. Benthic communities within sandy mobile sediments of the SNS are typically low in both numbers of taxa and individuals and dominated by species adapted to a degree of physical disturbance associated with tidal movement and wave action. Broken *Sabellaria spinulosa* tubes were collected in a few grab samples within the survey area but no intact *S. spinulosa* tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of *S. spinulosa* that could be classified as 'reef' within the surveyed area. Species diversity appeared to increase in areas of coarser sediments (favouring epilithic attachment). Epifauna was generally sparse throughout the survey area. No sensitive epifaunal species were identified near EI_H1.

Fish spawning and nursery activity will occur in the area, which may coincide with the drilling operations. Atlantic white-beaked dolphin, harbour porpoise and Atlantic white-sided dolphin have been recorded in the vicinity. Densities of these species range from high to low throughout the year. Common seal and the grey seal are resident in the SNS. The Wash and North Norfolk Coast SAC, provides ideal breeding site and haul out conditions, located 33.6km southwest of the operation area. Common seals usually feed within 50km of their haul-out site and therefore may be observed within the operational area. Grey seals usually feed within 100km of their haul-out site and therefore may be observed within the operational area, however it is estimated that they only spend 12% of their time at distances greater than 50 km from the coast. Seabird vulnerability is very high in October to December, high in February to April and August and September, moderate in January and low in May to June.

The fishing effort in the area (ICES 35F1) is rated low and medium for shellfish. Distribution of shellfish are concentrated towards the inshore area within ICES 35F1. Atlantic herring and sandeel spawn during the operational period, however the drill site area has been considered as "unsuitable" for herring spawning habitat, with a more suitable herring spawning habitat identified 4.5km south west of the operational area. Both Atlantic herring and sandeel spawning areas are unlikely to be affected at a population level. Spawning intensity for sandeels in the area is low.

Shipping density in the area is very high. A significant portion of vessel activity appear to be attributed to appearing to be a result of the Dudgeon Offshore windfarm which routes vessel traffic around its south western edge. Fishing activity has also been identified in the areas surrounding Elgood but the major traffic is associated with general shipping and passing vessels. No aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites have been



identified within 40km of the operation.

Given the location of the project, it is not likely that the areas identified at paragraphs 2(c)(i), (iii), (iv), (vi), (vii) or (viii) of Schedule 5 to the Regulations will be affected by the project.

Type and characteristics of the potential impact

In accordance with paragraph 3 of Schedule 5 to the Regulations, the likely significant effects of the project on the environment have been considered. Potential effects on the environment from the activities associated with the project were assessed, including impacts arising from atmospheric emissions, seabed disturbance, physical presence, planned discharges and accidental spills. Other than the matters considered further below, there is not likely to be any significant impact of the project on population and human health.

A 500m exclusion zone will be located around the EL_H1 drill site once the rig is located excluding unauthorised access of vessels and prohibiting access to fishing vessels. The temporary presence of the rig is unlikely to place restrictions on navigation. There are no navigational concerns in relation to the proposed location, and no objections were received from the navigational consultees.

Power generation by the MODU and flaring during well clean up operations will result in the emission of gases to the atmosphere, however it is expected the emissions will be rapidly dispersed and are not likely to have a significant impact. Atmospheric emissions will be reported via the Environmental Emissions Monitoring System (EEMS).

The cetacean density for Atlantic white-beaked dolphin, Atlantic white-sided dolphin and harbour porpoise (Annex II species), during the operational period (March to August), are low to moderate for Atlantic white-beaked dolphin and harbour porpoise, high for harbour porpoise in July and low for Atlantic white sided dolphin in August. The proposed operations are unlikely to have a significant impact on these species. Due to the distance of the drill site from shore harbour seals and grey seals (Annex II species) , are not likely to be encountered regularly at the drill site. Any noise generated during operations is expected to be within local background levels.

Broken *S. spinulosa* tubes were collected in a few grab samples within the survey area but no intact *S. spinulosa* tubes were evident from the video analysis. Inspection of side scan sonar data and ground-truthing with visual camera systems indicated that there are no areas of *S. spinulosa* that could be classified as 'reef' within the surveyed area. No evidence of any potential Annex I Habitats have been found in the vicinity. The nearest Annex I habitat 'Sandbanks which are slightly covered by seawater all of the time' is 17.1km south east of the location of the drill site (NNSR).

The cuttings from the well sections drilled using LTOBM will be skipped and shipped to shore for treatment and disposal and therefore not discharged to the marine



environment. The wellbore clean-up operations will result in the discharge of wastewater containing residual base oil from the LTOBM. Only the cuttings associated with the sections drilled using WBM will be discharged. This discharge of cuttings and associated drilling chemicals has been assessed and is not considered to have a likely significant effect on the environment. The physical siting of the rig will impact a total area of 762m² (each of the 3 spud cans has an individual footprint of 254m²). No additional rig stabilisation material is required. The impacts on benthic fauna from the physical siting of the rig and from the discharge of cuttings will be localised and not considered to have a significant effect.

There are no expected transboundary effects from the drilling operation due to the localised and temporary nature of the disturbance and the 110 km distance from the UK/Norway Median Line. It is not considered likely that any planned operational discharge will be detectable at this distance from the well location.

Although not a planned activity, a worst-case major accident scenario resulting from a potential well blow-out (gas condensate) was modelled and assessed. The developer has mitigation and control measures in place to prevent loss of well control which could have a significant impact. The proposed operations carried out as planned are not likely to have a significant effect on the environment and the probability of a large gas condensate well blow out from the proposed operations is low.

The Dudgeon offshore wind farm is operational and is approximately 0.77km from the drill site and the project is not considered to have any significant in-combination impacts. There are no planned construction operations, no aggregate dredging, military practice sites, sites of marine archaeological interests or aquaculture sites within the vicinity of the proposed operations. The drilling operations are in accordance with the East Offshore Marine Plan's objectives and policies. It is considered that the drilling of the EL_H1 development well is not likely to have a significant impact on other offshore activities or other users of the sea and no cumulative impacts are expected to occur.

Decision

Taking the above considerations into account, the Secretary of State has concluded that the project is not likely to have a significant impact on the environment and that an environmental impact assessment is not required.

2) Mitigation of significant effects

The following are features of the project or measures envisaged that the developer has proposed to avoid or prevent what might otherwise have been significant adverse effects on the environment:

Not applicable.